

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ACKERMAN MCQUEEN, INC.	§	
	§	
v.	§	Case No. 3:19-cv-03016-X
	§	
GRANT STINCHFIELD	§	

PLAINTIFF'S MOTION TO COMPEL

Plaintiff, Ackerman McQueen, Inc. (“AMc”), files this *Motion to Compel* (the “*Motion*”) and asks the Court to compel Defendant, Grant Stinchfield, to answer an interrogatory and produce certain documents in response to AMc’s written discovery requests. In accordance with the Local Rules, this motion is supported by the Brief filed contemporaneously herewith, which sets forth AMc’s contentions of fact and argument and authorities. The evidence in support of this motion is contained in the Appendix filed contemporaneously herewith.

WHEREFORE, AMc respectfully requests the Court to grant the following relief with regard to AMc’s interrogatories and requests for production:

1. Overrule Stinchfield’s objections based on undue burden and overbreadth: **Interrogatory No. 11, RFPs Nos. 2-4;**
2. Overrule Stinchfield’s objections based on the attorney-client privilege and work product doctrine: **RFP Nos. 2-4;**
3. Overrule Stinchfield’s relevance objections: **RFP Nos. 17-19;**
4. Compel complete production of the requested documents and information

within 10 days of this Court's Order; and

5. any further relief, at law or in equity, to which AMc may be justly entitled.

Dated: September 22, 2020.

Respectfully submitted,

/s/ J. Brian Vanderwoude

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ATTORNEYS FOR PLAINTIFF

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CERTIFICATE OF CONFERENCE

I hereby certify that on multiple occasions, including but not limited to September 22, 2020, September 15, 2020, June 9, 2020, and March 11, 2020, I conferred with Ian Shaw, counsel for Defendant, concerning the merits of this motion. Counsel for Defendant is opposed the relief sought in this motion.

/s/ Brian Vanderwoude

J. Brian Vanderwoude

CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2020, I filed the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas. I hereby certify that I have served the document on all counsel and/or pro se parties of record by a manner authorized by Federal Rules of Civil Procedure 5(b)(2).

/s/ Brian Vanderwoude

J. Brian Vanderwoude